



South Coast Air Quality Management District

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Negative Declaration (ND) for the Proposed PA04-0621 Butterfield Ranch Shopping Center

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final Negative Declaration (ND).

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final Negative Declaration. The SCAQMD staff would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

Steve Smith, Ph.D.
Program Supervisor, CEQA Section
Planning, Rule Development & Area Sources

Attachment

SS:GM

RVC050414-02
Control Number

Negative Declaration (ND) for the Proposed PA04-0621 Butterfield Ranch Shopping Center

1. In the Initial Study under Section 3. Air Quality a-b) pages 4-5 of the Draft Negative Declaration (Draft ND), the lead agency cites the 1993 General Plan Final EIR (FEIR) stating that although the proposed project was not specifically analyzed it “was anticipated as part of the Commercial Developments for the City.” Relying on a 1993 document relative to air quality is not appropriate because, since 1993, there have been substantial changes in mobile source emission factors and inventories. The lead agency also states in Section 3.a.b. that although the lead agency is in the process of updating the 1993 General Plan FEIR, the proposed project was not specifically analyzed in the Draft EIR. In both cases, the lead agency provides no technical details on air quality impacts of the proposed project. Since the lead agency has not specifically analyzed air quantity impacts for the proposed project, it has not demonstrated that air quality impacts are less than significant for the proposed 20-acre project. It is recommended that the lead agency quantify air quality impacts specifically for the proposed project using either the most current version of URBEMIS 2002 emissions model, version 8.7.0, which can be accessed at the SCAQMD website: <http://www.aqmd.gov/ceqa/urbemis.html> or the lead agency can follow the calculation methodologies in Chapter 9 and the Appendix to Chapter 9 in the South Coast AQMD’s CEQA Air Quality Handbook.

The Draft ND should contain sufficient technical detail to permit full assessment of significant environmental impacts by reviewing agencies and members of the public. Therefore, the Final ND and future CEQA documents prepared by the lead agency should include the emission estimates, emission factors, methodologies and control efficiencies for any proposed mitigation measures. This information could be included in the Final ND as part of the narration or as an appendix.

In the event that quantification of the air quality impacts from the proposed project, either construction and/or operational, exceed established significance thresholds, mitigation measures may be necessary. In addition to identifying feasible mitigation measures, the lead agency should specify the control efficiency of each mitigation measure (if one is available) and apply the control efficiency to the total emissions estimated for the project. In this way the lead agency can quantitatively determine the significance of air quality impacts from the proposed project.

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2. Under section 15.a-b Transportation/Traffic on page 17 and 18 of the Draft ND, the lead agency cites a Traffic Impact Study prepared in February 1, 2005 by RK Engineering Group, Inc. (Traffic Impact Study). In paragraph three on page 17, the lead agency states that the proposed project's traffic impacts were not specifically analyzed in the Draft ND. Paragraph three contradicts the statement in paragraph one.
3. Since a traffic study, apparently, was prepared for the proposed project, the results should have been included in the Draft ND. The SCAQMD is interested in traffic data because of the direct relationship between traffic and traffic congestion to air quality. According to the Traffic Impact Study (page 17), the lead agency estimates that all study intersections are projected to operate at Level of Service (LOS) D or better during peak hours except for one intersection that is projected to operate at LOS E during peak hours. The lead agency, however, doesn't provide any information on the actual effect on the LOS of local intersections in the vicinity of the project. This information is important because it will determine if a CO hotspots analysis should be performed. The SCAQMD recommends that a CO hotspots analysis be performed if a project results in increasing congestion whereby the LOS of an intersection is changed from C to D or if there is a two-percent increase in the volume to capacity ratio of any intersection rated D or worse.

Based on the above criteria for a CO hotspots analysis, if a CO hotspots analysis is warranted, please refer to the most current Cal Trans guidance regarding performing a CO hotspots analysis. This information can be obtained at the following internet address: <http://www.dot.ca.gov/hq/env/air/coprot/htm> .